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ATTORNEY FOR PLAINTIFFS

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

JEFORY MASHBURN, On Behalf of  
Minor CM, JOSEPH CORNELISON,  
On Behalf of Minor, RC, DARCY  
TUTTORO, On Behalf of Minor JT,  
NATHANAEL WILLIAMS,  
AMY HINMON, BRENDA NYHART,  
On Behalf of Minor, JL, All individually  
and on behalf of a class of others similarly  
situated,

Plaintiffs,

v.

YAMHILL COUNTY,  
TIM LOEWEN,  
both individually and in his  
official capacity as Director,  
CHUCK VESPER,  
both individually and in his  
official capacity as Division Manager,

Defendants.

Case No. 08-718HU

PLAINTIFFS' CONCISE STATEMENTS  
OF MATERIAL FACTS

Come now plaintiffs, by and through their attorney Leonard R. Berman, and file this Concise Statements of Facts.

1. Defendant Yamhill County has a policy to strip search all juvenile detainees regardless of charges or circumstances. (Ex 1. Yamhill County Juvenile Detention Center Policies.)
2. Defendant Yamhill County believes it is proper to strip search all juveniles to check for evidence of abuse.. (Ex. 2. Yamhill County Press Release.)
3. On November 2, 2006, Plaintiff Amy Hinmon was strip searched after bookingfor Failure to Appear on Minor in Possession, and Contempt Hearing for Failing to Complete Evaluation. (Exhibit 3, Affidavit of Amy Hinmon)
4. On or about September 4, 2007, Plaintiff Joseph Lewis (JL) was strip searched on booking on charges of Encouraging Child Pornography . (Exhibit 4, Affidavit of Joseph Lewis)
5. On or about June 15, 2006, Nathanael Williams was strip searched on charges of Robbery 3, Theft 3, Minor in Possession of Alcohol, Criminal Trespass, Harassment and lodged in the Yamhill County Juvenile Detention Center on June 15, 2006. He was also lodged and strip- searched August 3, 2006 for Minor in Possession of Tobacco, Nighttime Curfew Violation and Criminal Trespass. (Exhibit 5, Affidavit of Nathanael Williams)

6. RC was strip searched upon entry to the Yamhill County Juvenile Detention Center on or about February 22, 2007 and for five days sustained about eight strip searches after contact meetings with counselors and attorneys, and suffered anguish and humiliation each time, for charges of Sex Abuse 1.(Exhibit 6, Affidavit of Cornelison)
  
7. . CM was strip searched upon entry to the Yamhill County Juvenile Detention Center on or about February 22, 2007 and for five days sustained about five strip searches after contact meetings with counselors and attorneys, and suffered anguish and humiliation each time, for charges of Sex Abuse 1.(Exhibit 7, Affidavit of Mashburn)

DATED this 8<sup>th</sup> day of June, 2009.

Respectfully Submitted,

S//S Leonard R. Berman

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LEONARD R. BERMAN, OSB# 96040  
Attorney for Plaintiff